

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Contina Patricia Jones, Debtor**

**Case No. 19-03686-JAW  
CHAPTER 13**

**RESPONSE**

COMES NOW, Debtor, by and through counsel, and responds to Trustee's Notice and Motion to Modify (dk # 41) as follows:

1. Debtor commenced this case on October 16, 2019 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor is in the process of reviewing her case with counsel to determine if her plan can be modified and she can incur debt to purchase a new vehicle.
3. Debtor wishes for additional time to finish this process.

WHEREFORE, Debtor pray for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
Attorney for Debtor

Of Counsel:

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on January 26, 2022, to:

By Electronic CM/ECF Notice:

Harold Barkley

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.